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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

## *In re Google Generative AI Copyright Litigation*

Master File Case No. 5:23-cv-03440-EKL-SVK  
Consolidated Case No. 5:24-cv-02531-EKL-SVK

**PLAINTIFFS' ADMINISTRATIVE MOTION  
TO CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE FILED  
UNDER SEAL RE PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION**

Civil L.R. 7-11

Judge: Hon. Eumi K. Lee

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs hereby move the Court to consider whether portions of Plaintiffs' Notice of Motion and Motion for Class Certification, supporting documents, and exhibits thereto should be filed under seal. Google contends the documents sought to be filed under seal contain information designated HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order entered by this Court.

In the Ninth Circuit, when a party seeks to seal portions of a nondispositive motion, a “good cause” standard is applied. *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003). Good cause exists if a district court grants a protective order to seal documents because “it already has determined that ‘good cause’ exists to protect this information from being disclosed to the public by balancing the needs for discovery against the need for confidentiality.” *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (internal cite omitted). The party seeking to seal bears the burden of showing compelling reasons apply. *See id.* at 1178.

In addition, Civil Local Rule 79-5(f) requires that when the “Filing Party seeks to seal because that document has been designated as confidential by another party, [ ] (‘Designating Party’),” the Filing Party must file an “Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed.” In the motion the Filing Party “must identify each document or portions thereof for which sealing is sought, but the Filing Party need not satisfy the showing required in subsection [79-5(f)] (c)(1).” *Id.* Within 7 days of the motion being filed, “the Designating Party must file a statement and/or declaration as described in subsection [79-5(f)] (c)(1).” *Id.*

Specifically, the material subject to the administrative motion includes the following:

<b>ECF No.</b>	<b>Document</b>	<b>Portions Sought to be Sealed</b>	<b>Reason(s) for Sealing</b>
253-1	Plaintiffs' Notice of Motion and Motion for Class Certification	Highlighted portions at ii, 1, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, 22, 24	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-2	Plaintiffs' Proposed Trial Plan	Highlighted portions at 1, 2, 4, 5	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

1	253-3	Joint Declaration of Joseph R. Saveri and Lesley E. Weaver (“Counsel Declaration”)	Highlighted portions at 6	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
2	253-4	Ex. 1 (Expert Report of Meredith McCarron)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-5	Ex. 2 (Expert Report of David Doermann)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-6	Ex. 3 (Expert Report of Victoria Furniss)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-7	Ex. 4 (Expert Report of Michael Smith)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-8	Ex. 5 (Google’s Amended R&Os to 2 <sup>nd</sup> Set of RFAs)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-9	Ex. 13 (Deposition transcript excerpts of Carver 30(b)(6))	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-10	Ex. 14 (Deposition transcript excerpts of Liechty 30(b)(6))	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-11	Ex. 15 (Deposition	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES

1	transcript excerpts of Jaskiewicz)		ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
2	253-12 Ex. 16 (Deposition transcript excerpts of Baldrige)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-13 Ex. 17 (Deposition transcript excerpts of Xiao)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-14 Ex. 18 (Deposition transcript excerpts of Vinyals)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-15 Ex. 19 (Deposition transcript excerpts of Price 30(b)(6))	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-16 Ex. 20 (Deposition transcript excerpts of Ayoub)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-17 Ex. 21 (Deposition transcript excerpts of Barker 30(b)(6))	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-18 Ex. 22 (Deposition transcript excerpts of Dai)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-19 Ex. 27 (Liechty Ex. 17)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-20 Ex. 28 (GOOG-AIC- 000013914)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant

			to provide evidence, per Local Rule 79-5(f).
253-21	Ex. 29 (GOOG-AIC-000013928)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-22	Ex. 30 (GOOG-AIC-000014036)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-23	Ex. 31 (GOOG-AIC-000014220)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-24	Ex. 32 (GOOG-AIC-000014257)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-25	Ex. 33 (GOOG-AIC-000014911)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-26	Ex. 34 (GOOG-AIC-000014934)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-27	Ex. 35 (GOOG-AIC-000015660)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-28	Ex. 36 (GOOG-AIC-000017739)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-29	Ex. 37 (GOOG-AIC-000019423)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

1	253-30	Ex. 38 (GOOG-AIC-000019701)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
2	253-31	Ex. 39 (GOOG-AIC-000022456)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-32	Ex. 40 (GOOG-AIC-000022473)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-33	Ex. 41 (GOOG-AIC-000029651)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-34	Ex. 42 (GOOG-AIC-000047085)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-35	Ex. 43 (GOOG-AIC-000047114)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-36	Ex. 44 (GOOG-AIC-000047169)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-37	Ex. 45 (GOOG-AIC-000047194)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-38	Ex. 46 (GOOG-AIC-000047239)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-39	Ex. 47 (GOOG-AIC-	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES

1	000047292)		ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).	
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3	253-40	Ex. 48 (GOOG-AIC-000047309)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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5	253-41	Ex. 49 (GOOG-AIC-000047342)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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7	253-42	Ex. 50 (GOOG-AIC-000047354)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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9	253-43	Ex. 51 (GOOG-AIC-000047377)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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11	253-44	Ex. 52 (GOOG-AIC-000049509)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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13	253-45	Ex. 53 (GOOG-AIC-000049535)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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15	253-46	Ex. 54 (GOOG-AIC-000105862)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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17	253-47	Ex. 55 (GOOG-AIC-000109453)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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19	253-48	Ex. 56 (GOOG-AIC-000111705)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
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2	253-49	Ex. 57 (GOOG-AIC-000115985)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-50	Ex. 58 (GOOG-AIC-000115988)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-51	Ex. 59 (GOOG-AIC-000115991)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-52	Ex. 60 (GOOG-AIC-000117399)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-53	Ex. 61 (GOOG-AIC-000117854)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-54	Ex. 62 (GOOG-AIC-000119834)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-55	Ex. 63 (GOOG-AIC-000123966)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-56	Ex. 64 (GOOG-AIC-000125257)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-57	Ex. 65 (GOOG-AIC-000126370)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
11	253-58	Ex. 66	Entire document	Information Google contends is HIGHLY

1	(GOOG-AIC-000174199)		CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).	
2	253-59	Ex. 67 (GOOG-AIC-000203621)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-60	Ex. 68 (GOOG-AIC-000206856)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-61	Ex. 69 (GOOG-AIC-000207272)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-62	Ex. 70 (GOOG-AIC-000207404)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-63	Ex. 71 (GOOG-AIC-000274584)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-64	Ex. 72 (GOOG-AIC-000274590)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-65	Ex. 73 (GOOG-AIC-000301374)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-66	Ex. 74 (GOOG-AIC-000324279)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-67	Ex. 75 (GOOG-AIC-000345528)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant

			to provide evidence, per Local Rule 79-5(f).
253-68	Ex. 76 (GOOG-AIC-000345530)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-69	Ex. 77 (GOOG-AIC-000346328)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-70	Ex. 78 (GOOG-AIC-000361821)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-71	Ex. 79 (GOOG-AIC-000363422)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-72	Ex. 80 (GOOG-AIC-000370492)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-73	Ex. 81 (GOOG-AIC-000373099)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-74	Ex. 82 (GOOG-AIC-000373189)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-75	Ex. 83 (GOOG-AIC-000373306)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
253-76	Ex. 84 (GOOG-AIC-000374443)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

1	253-77	Ex. 85 (GOOG-AIC-000383491)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
2	253-78	Ex. 86 (GOOG-AIC-000385158)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-79	Ex. 87 (GOOG-AIC-000387855)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-80	Ex. 88 (GOOG-AIC-000387896)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-81	Ex. 89 (GOOG-AIC-000388471)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-82	Ex. 90 (GOOG-AIC-000389563)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-83	Ex. 91 (GOOG-AIC-000389911)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-84	Ex. 92 (GOOG-AIC-000471928)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-85	Ex. 93 (GOOG-AIC-000472033)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-86	Ex. 94 (GOOG-AIC-	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
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1	000481984)		ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).	
2	253-87	Ex. 95 (GOOG-AIC-000500211)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-88	Ex. 96 (GOOG-AIC-000509778)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-89	Ex. 97 (GOOG-AIC-000511266)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-90	Ex. 98 (GOOG-AIC-000520395)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-91	Ex. 99 (GOOG-AIC-000521732)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-92	Ex. 100 (GOOG-AIC-000582441)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-93	Ex. 101 (GOOG-AIC-000584939)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-94	Ex. 102 (GOOG-AIC-000584953)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-95	Ex. 103 (GOOG-AIC-000619097)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

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2	253-96	Ex. 104 (GOOG-AIC-000636213)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-97	Ex. 105 (GOOG-AIC-000641126)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-98	Ex. 106 (GOOG-AIC-000662311)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-99	Ex. 107 (GOOG-AIC-000674328)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-100	Ex. 108 (GOOG-AIC-000710430)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-101	Ex. 109 (GOOG-AIC-000710445)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-102	Ex. 110 (GOOG-AIC-000711295)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-103	Ex. 111 (GOOG-AIC-000711405)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-104	Ex. 112 (GOOG-AIC-000711457)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
11	253-105	Ex. 113	Entire document	Information Google contends is HIGHLY

1	(GOOG-AIC-000737395)		CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).	
2	253-106	Ex. 114 (GOOG-AIC-000760043)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-107	Ex. 115 (GOOG-AIC-000763515)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-108	Ex. 116 (GOOG-AIC-000767551)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-109	Ex. 117 (GOOG-AIC-000767937)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-110	Ex. 118 (GOOG-AIC-000767951)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-111	Ex. 119 (GOOG-AIC-000767976)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-112	Ex. 120 (GOOG-AIC-000768069)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-113	Ex. 121 (GOOG-AIC-000768084)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-114	Ex. 122 (GOOG-AIC-000769893)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant

			to provide evidence, per Local Rule 79-5(f).	
2	253-115	Ex. 123 (GOOG-AIC-000792412.C)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-116	Ex. 124 (GOOG-AIC-000792731.C)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-117	Ex. 125 (GOOG-AIC-000793042.C)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-118	Ex. 126 (GOOG-AIC-000805421)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-119	Ex. 127 (GOOG-AIC-000813651)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-120	Ex. 182 (GOOG-AIC-000035958)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-121	Ex. 183 (GOOG-AIC-000078250)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-122	Ex. 184 (GOOG-AIC-000118693)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-123	Ex. 185 (GOOG-AIC-000119254)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

1	253-124	Ex. 186 (GOOG-AIC-000121339)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
2	253-125	Ex. 187 (GOOG-AIC-000345814)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
3	253-126	Ex. 188 (GOOG-AIC-000274573)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-127	Ex. 189 (GOOG-AIC-000172514)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-128	Ex. 190 (GOOG-AIC-000346842)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-129	Ex. 191 (GOOG-AIC-000406798)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-130	Ex. 192 (GOOG-AIC-000409943)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-131	Ex. 193 (GOOG-AIC-000582310)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
9	253-132	Ex. 194 (GOOG-AIC-000674464)	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
10	253-133	Ex. 195 (GOOG-AIC-	Entire document	Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES

1	000674469)		ONLY under the Protective Order; Defendant 2 to provide evidence, per Local Rule 79-5(f).
3	253-134	Ex. 196 (GOOG-AIC- 000674532)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
4	253-135	Ex. 197 (GOOG-AIC- 000744803)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
5	253-136	Ex. 198 (GOOG-AIC- 000550228)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
6	253-137	Ex. 199 (GOOG-AIC- 000520533)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
7	253-138	Ex. 200 (GOOG-AIC- 000115985)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).
8	253-139	Ex. 201 (GOOG-AIC- 000764871)	Entire document Information Google contends is HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order; Defendant to provide evidence, per Local Rule 79-5(f).

Plaintiffs seek to file under seal portions of the Motion, Proposed Trial Plan, Counsel Declaration, and exhibits that quote or summarize portions of materials designated by Google as “Highly Confidential—Attorney’s Eyes Only.” In compliance with their Protective Order obligations and the Civil Local Rules of this District, Plaintiffs are submitting under seal, along with this Administrative Motion, an unredacted copy of the documents referenced in the table above pursuant to Civil Local Rule 79-5(d). Plaintiffs understand that Google, as the Designating Party, will submit a statement or declaration under Civil Local Rule 79-5(f)(3) stating the reasons for keeping the identified material under seal within seven (7) days of

1 this motion. Plaintiffs reserve the right to challenge Google's sealing request but, as conveyed to Google,  
 2 do not intend to oppose sealing for this dispute.

3 Dated: October 14, 2025

4 By: /s/ Lesley E. Weaver  
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 6 Anne K. Davis (SBN 267909)  
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23 ADMIN. MOT. TO CONSIDER WHETHER ANOTHER  
 24 PARTY'S MATERIAL SHOULD BE FILED UNDER  
 25 SEAL

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6 *Additional Counsel for Individual and Representative Plaintiffs and the Proposed Class*  
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1                   **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2                   I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from  
3 the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

4                   Executed this 14th day of October, 2025, at Oakland, California.

5                   */s/ Lesley E. Weaver*

6                   Lesley E. Weaver

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1                   **CERTIFICATE OF SERVICE**

2       I, Lesley E. Weaver, hereby certify that on October 14, 2025, I electronically filed the foregoing  
3 document with the Clerk of the United States District Court for the Northern District of California using  
4 the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy  
5 of the under seal filing to be delivered to counsel for Defendant Google LLC via electronic mail.

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7                   */s/ Lesley E. Weaver*

8                   Lesley E. Weaver

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